

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
v. § CRIMINAL NO. 4:22-CR-612
§
§
GARY DEEL §
§

DEEL'S PARTLY UNOPPOSED MOTION TO TRAVEL WITHOUT GPS

Gary Deel, through undersigned, moves this Court to allow him to travel without having to wear his GPS to South Carolina for engagement photos with his fiancé/wedding-location scouting, showing specifically:

1. Deel is engaged. He and his fiancé would like to travel to Charleston, South Carolina, from August 30, 2023, to Sept 4, 2023, (economy class) for engagement photos and viewing potential venues for their wedding.
 2. Deel having to wear a GPS monitor in said photos is less than ideal.
 3. It just so happens that undersigned Zach Fertitta will be there over mostly the same period of time and will meet with Deel.

4. Co-counsel Davis spoke August 18, 2023, to pretrial officer Sutton. Officer Sutton said that Deel is compliant with all release conditions and the officer has no issues with Deel going to South Carolina and removing his GPS monitor for that trip.

5. Co-counsel Davis emailed that same day the prosecutor. He does not object to the travel but does object to the GPS removal. Deel therefore respectfully requests this Court to allow him travel without having to wear his GPS to South Carolina for engagement photos with his fiancé/wedding-location scouting.

Respectfully Submitted,

/s/ Zachary B. Fertitta
Zachary B. Fertitta

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CERTIFICATE OF CONFERENCE

I certify that co-counsel Neal Davis on August 18, 2023, spoke to pretrial officer Sutton. Officer Sutton said that Deel is compliant with all release conditions and the officer has no issues with Deel going to South Carolina and removing his GPS monitor for that trip. Co-counsel Davis also emailed the prosecutor that same day and he does not object to the travel but does object to the GPS removal.

/s/ Zachary B. Fertitta
ZACHARY B. FERTITTA

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion has been sent via electronic mail to the Government on August 21, 2023.

/s/ Zachary B. Fertitta
ZACHARY B. FERTITTA

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ORDER

ON THIS DAY came to be considered Deel's Motion to Travel Without GPS, and it is GRANTED and Deel is permitted to travel without having to wear his GPS to South Carolina for engagement photos with his fiancé and for wedding-location scouting there from August 30, 2023, to Sept 4, 2023.

SIGNED AND ENTERED August ____, 2023, at Houston,
Texas.

**HONORABLE ANDREW S. HANEN
U.S. DISTRICT JUDGE**